

**UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

IN RE: NATIONAL FOOTBALL
LEAGUE PLAYERS' CONCUSSION
INJURY LITIGATION

Case No. 12-md-2323 (AB)

MDL No. 2323

Kevin Turner and Shawn Wooden,
*on behalf of themselves and others
similarly situated,*

Hon. Anita B. Brody

Plaintiffs,

National Football League and
NFL Properties LLC,
successor-in-interest to NFL Properties,
Inc.,

Defendants.

THIS DOCUMENT RELATES TO:
ALL ACTIONS

**MOTION FOR EXTENSION OF TIME TO REPLY TO
BROWN GREER'S RESPONSE [ECF NO. 10488] TO MOVANTS' MOTION
FOR COURT INTERVENTION TO STOP MULTIPLE AUDITS [ECF NO. 10434]**

Retired NFL Players, Identified by SCM Program ID's, 950001367, 100000328, 900000835, 100000978, 100001053, 900003656, 100002971, 900003916, 900005730, 100004998, 100005793, 100006318, 100006364, 100006825, 900009395, 110020412, 900009941, 950000168, 900011914, 100009522, 100010585, 100010859, 100011009, 100011127, 100012053, 100012125, 950000167, 1000013111, 100013967, 100014232, 100014253, 100014709 (collectively "Movants") file this Motion for Extension of Time to Reply to Brown Greer's Response [ECF No. 10488] to Movant's Motion for Court Intervention to Stop Multiple Audits of Settlement Class Members that Violate the Settlement Agreement (the

“Motion”) [ECF No. 10434], and in support, and in support state as follows:

1. X1Law’s Reply to the Claims Administrator Brown Greer’s Response [ECF No. 10488] to the Motion is due on March 21, 2019.
2. On March 19, 2019, Brown Greer filed a Motion for Leave to File Amended Response [ECF No. 10503] and attached Amended Response to the Motion.
3. Movants do not oppose Brown Greer’s Motion for Leave to Amend.
4. However, lead counsel for Movants is out of town on a family vacation and requires additional time to consider the Amended Response and revise Movants’ Reply. Therefore, Movants requests that the Court grant a brief ten (10) day extension of time to serve its Reply to Brown Greer’s Response and Amended Response through and including Friday, March 29, 2019.
5. Counsel for Brown Greer is in agreement with the extension.
6. The parties will not be prejudiced by this extension of time.
7. The request contained herein is not intended for purposes of delay and will not cause any prejudice to the Court or any party to this action.

Memorandum of Law

Rule 6(b) of the Federal Rules of Civil Procedure provides that this Court may enlarge the time for filing a response upon a showing of good cause. Where, as here, the request for extension is made prior to the expiration of the specified period of time, no finding of excusable neglect is required. Fed. R. Civ. P. 6(b)(1)(A). Here, Patrick Tighe, Esq. is out of town on a family vacation with his young children and requests additional time to review Brown Greer’s Amended Response and file an appropriate Reply. Since this extension of time is sought in good faith, not for any purposes of delay, and has been requested prior to the expiration of the deadline, X1Law respectfully requests that the Court grant its request for an enlargement of time.

CERTIFICATE OF GOOD FAITH CONFERENCE

Patrick Tighe, Esq. of X1Law, P.A. conferred with Orran Brown, Esq. of Brown Greer on March 20, 2019, and Mr. Brown has agreed to the relief requested in this Motion.

Dated: March 20, 2019

Respectfully Submitted,

Patrick J. Tighe
Attorneys for Plaintiffs
X1LAW, P.A.f/k/a Patrick J. Tighe, P.A.
721 US Highway 1, Ste 121
North Palm Beach, FL 33408
Phone: 561-537-3319
Fax: 561-537-7193
Pat@X1LAW.com
Florida Bar No. 568155

Attorneys for Plaintiffs/Movants
MGS LAW, P.A.
601 Heritage Drive, Suite 141
Jupiter, FL 33458
Phone: 561-620-5460
michael@mgs2law.com
Florida Bar No. 0783471

s/ Michael St. Jacques
Michael G. St. Jacques, II

CERTIFICATE OF SERVICE

I hereby certify that on March 20, 2019, the foregoing document was electronically filed with the United States District Court for the Eastern District of Pennsylvania via the Court's CM/ECF system, and that the filing is available for downloading and viewing from the electronic court filing system by counsel for all parties.

MGS LAW, P.A.

s/ Michael St. Jacques
MICHAEL G. ST. JACQUES, II